2019-02-12 Citrus Section 3 Application & Related Correspondence

Submissions and Correspondence Related to the Proposed Florida SLN for Use of Aldicarb on Oranges, Lemons, Limes and Grapefruit

2017-10-06 email to EPA (Rosanna Louie-Juzwiak) Requesting Meeting re AgLogic Florida SLN for Citrus

2017-10-06a Support Letter from Roe and Sons Dated 9-28-17

2017-10-06b WSJ article on Florida Citrus Dated 9-26-17

2017-10-06c Qureshi & Stansly Greening Summit 2008

2017-10-08 email from EPA (Rosanna Louie-Juzwiak) Responding to Our Request for Meeting

2017-10-20 email to EPA (Rosanna Louie-Juzwiak) with Five Attachments re AgLogic Florida SLN for Citrus
We notified EPA that AgLogic was conducting a dietary exposure and risk assessment for aldicarb in support of a proposed SLN for use on citrus in Florida. This risk assessment included all labeled crops plus orange, lemon, lime, and grapefruit at 20% crop treated. Preliminary results indicated that the most highly exposed sub-population, children age 1 to 2 years, was estimated to have a dietary exposure of about 83% of the aPAD. We also attached additional information including an updated aldicarb dietary risk assessment conducted by Bayer CropScience, dated July 27, 2010, that indicated there was a reasonable certainty of no harm to any age or population subgroup exposed to aldicarb derived residues in food and drinking water. It is important to note that Bayer's updated dietary risk assessment accounted for all labeled crops including citrus crop group 10 and potatoes. There is no indication that EPA ever reviewed this risk assessment. We also submitted letters of support from Florida citrus growers.
2017-10-20a Bayer Acute Dietary RA Dated 7-27-10
2017-10-20b Bayer Acute Dietary RA Summary Dated 7-27-10
2017-10-20c Support Letter from Premier Citrus Dated 10-11-17
2017-10-20d Support Letter from Lykes Brothers Dated 10-2-17
2017-10-20e Support Letter from University of Florida Dated 10-16-17

2017-10-25 email from EPA (Rosanna Louie-Juzwiak) Denying Our Request for EPA Meeting re AgLogic Florida SLN for Citrus

2017-10-25 email to EPA (Rosanna Louie-Juzwiak) re Status of Meeting and AgLogic Florida SLN for Citrus

2017-11-14 Drinking Water Exposure Assessment Supporting Florida SLN MRID 50549101

2017-12-26 email to EPA (Richard Gebken, Susan Bartow, Tawanda Maignan, Rosanna Louie-Juzwiak) re Issues with AgLogic Florida SLN for Citrus and Request for Conference Call re and AgLogic Florida SLN for Citrus

2017-12-26 email from EPA (Rosanna Louie-Juzwiak) Saying They Would Consider a Conference Call

2017-12-28 Dietary Exposure and Risk Assessment Supporting Florida SLN MRID 50549102

2018-01-16 email from EPA (Rosanna Louie-Juzwiak, Tawanda Maignan) re Florida SLN for Citrus

2018-02-12 email from EPA (Tawanda Maignan) Scheduling EPA-FDACS-Pyxis Conference Call re Aldicarb Citrus Use in Florida

2018-02-12 emailed Water and Dietary Risk Assessments to EPA (Susan Bartow)
Prior to our official submission, we emailed EPA (Susan Bartow) the *Aldicarb: Drinking Water Exposure Assessment*, dated November 14, 2017, and the *Aldicarb. Acute Aggregate Dietary (Food and Drinking Water) Exposure and Risk Assessments for Proposed Uses*, dated December 28, 2017. As noted in the email to EPA dated October 20, 2017, these risk assessments were conducted in support of a proposed SLN for use of aldicarb on citrus in Florida. The dietary risk assessment included all labeled crops plus orange, lemon, lime, and grapefruit at 20% crop treated. The most highly exposed sub-population, children age 1 to 2 years, was estimated to have a dietary exposure of 57.1% of the aPAD.
2018-02-12a Drinking Water Exposure Assessment Dated 11-14-17 Supporting Florida SLN
2018-02-12b Dietary Exposure and Risk Assessment Dated 12-28-17 Supporting Florida SLN

2018-02-14 Notes from 2-14-18 EPA-FDACS-Pyxis Conference re Issues with AgLogic Florida SLN for Citrus

2018-02-20 Notes from 2-14-18 EPA-FDACS-Pyxis Conference Call re Issues with AgLogic Florida SLN for Citrus

2018-03-19 Submitted Water and Dietary Risk Assessments to EPA (Richard Gebken)
We officially submitted the *Aldicarb: Drinking Water Exposure Assessment* (MRID 50549101), dated November 14, 2017, and the *Aldicarb. Acute Aggregate Dietary (Food and Drinking Water) Exposure and Risk Assessments for Proposed Uses* (MRID 50549102), dated December 28, 2017. As noted in the email to EPA dated October 20, 2017, these risk assessments were conducted in support of a proposed SLN for use of aldicarb on citrus in Florida. The dietary risk assessment included all labeled crops plus orange, lemon, lime, and grapefruit at 20% crop treated. The most highly exposed sub-population, children age 1 to 2 years, was estimated to have a dietary exposure of 57.1% of the aPAD.
2018-03-19a Drinking Water Exposure Assessment Dated 11-14-17 Supporting Florida SLN MRID 50549101
2018-03-19b Dietary Exposure and Risk Assessment Dated 12-28-17 Supporting Florida SLN MRID 50549102

2018-07-02 email to EPA (Richard Keigwin, Nancy Beck, Richard Gebken, Tawanda Maignan) Transmitting Letter re AgLogic Florida SLN for Citrus
This letter, addressed to Richard Keigwin and Nancy Beck, stated that AgLogic conducted a dietary exposure and risk assessment to assist the Agency in its assessment of aldicarb, including use on citrus under a Florida SLN. Additionally, it noted that this risk assessment was submitted to EPA earlier this year on March 19, 2018 and that the risk assessment was conducted using models and methods identical to those used by EPA's risk assessors. The risk assessment demonstrated that 20% of the US citrus crop may be treated with aldicarb and dietary exposures (including food and water) for all sub-populations are well below any level of concern.
2018-07-02a Letter to EPA (Richard Keigwin, Nancy Beck) re AgLogic Florida SLN for Citrus
2018-07-02b Attachment 1 Affidavits from Growers and Researchers
2018-07-02c Attachment 2 Letters of Support from Growers and Researchers

2018-07-16 email to EPA (Richard Keigwin, Nancy Beck, Richard Gebken, Tawanda Maignan) Requesting Meeting re AgLogic Florida SLN for Citrus

2018-07-19 email from EPA (Shannon Jewell) re Confirming July 26 Meeting and Attendees

2018-07-19 email to EPA (Shannon Jewell) Confirming July 26 Meeting with EPA

2018-07-20 email from EPA (Shannon Jewell) re Update on Meeting Attendees

2018-07-20 email to EPA (Shannon Jewell) Confirming AgLogic Meeting Attendees

2018-07-24 email to EPA (Shannon Jewell) with Update on AgLogic Meeting Attendees

2018-07-26 AgLogic Presentation at Meeting with EPA re Florida SLN for Aldicarb on Citrus
This PowerPoint presentation, and handout, reviewed the aldicarb acute dietary exposure and risk analysis that was submitted to EPA on March 19, 2018 and stated that *"Aldicarb treatment of 20% of the US citrus crop results in dietary exposures well below any EPA Level of Concern for the general US population and all sub-populations."* The acute Population Adjusted Dose (aPAD) at the 99.9th percentile of exposure children age 1 to 2 years old was estimated at 57.1% of the aPAD. EPA said that the drinking water exposure used in our dietary risk assessment calculations was based on a lateral flow velocity of 0.3 ft/day, as opposed to the 1 ft/day in the Agency's assessment. We explained that 0.3 ft/day is the standard lateral flow rate that has been in use since 1989.

2018-07-26 Note on Meeting with EPA

2018-07-26 Sign-In Sheet of EPA-AgLogic Meeting Participants

2018-08-15 EPA (Richard Keigwin) Letter to AgLogic re Concerns About Aldicarb Florida SLN Citrus
This letter summarized the meeting of July 26, 2020 and clarified EPA's position regarding the proposed SLN for use of aldicarb on Florida citrus and stated that *". . . 24(c) registrations are not likely to be an appropriate means for this particular use expansion."* Furthermore, the letter said that the Agency's assessments conducted to date indicate it is

unlikely that the program could make a safety finding for the dietary assessment if registration of use of aldicarb on oranges were to be pursued. The letter also said that it may be appropriate to revise this assessment if AgLogic can provide information to (1) support the key modeling inputs mentioned their acute aggregate dietary assessment, (2) provide proof that aldicarb is no longer registered or used in Mexico, and (3)provide justification for why future use of aldicarb on citrus will not exceed 20% of the national citrus crop. Additionally, the letter stated that AgLogic may have used a ground water lateral flow velocity of 0.3 ft/day, as opposed to the 1 ft/day used in the Agency's assessment and requested that AgLogic provide information that supports this lateral flow velocity.

2018-09-14 email to EPA (Richard Keigwin, Kimberly Bingham, Richard Gebken, Tawanda Maignan, Bo Davis, Michael Goodis, Kevin Costello, Yu-Ting Guilaran) Transmitting Letter and Attachments re Florida SLN Citrus Issues
This response to Richard Keigwin's letter, dated August 15, 2018, consists of a cover letter and four attachments addressing the three concerns identified in the letter. We clearly explained, and documented, that (1) the resulting dietary exposure will be well below any EPA Level of Concern for the general US population and all sub-populations and that the aRFD for the most sensitive population, children age 1-2, was calculated to be 78.9 based on DEEM-FCID Version 3.18; (2) we documented that aldicarb is not used on any crop in Mexico; and (3) we showed that aldicarb will be used on no more than 20% of the national citrus crop. Our comprehensive report on ground water lateral flow velocity explained why it is appropriate to use a lateral flow velocity of 0.49 ft/day when conducting aldicarb exposure and risk assessments.
2018-09-14a Letter to EPA (Richard Keigwin, et.al.) Responding to Concerns About Aldicarb Florida SLN on Citrus
2018-09-14b Attachment A Aldicarb Is No Longer Used in Mexico
2018-09-14c Attachment B Assumption of Aldicarb Use on No More than 20% Citrus is Highly Conservative
2018-09-14d Attachment C Use of a Lateral Groundwater Flow Velocity of 0.49 ft per day
2018-09-14e Attachment D Aldicarb Drinking Water Exposure Assessment & Aldicarb Dietary Exposure & Risk Assessment

2018-09-26 Drinking Water Exposure Assessment MRID 50693401 and MRID 50695601

2018-09-28 Dietary Exposure and Risk Assessment MRID 50693402 and MRID 50695602

2018-10-03 Letter to EPA (Richard Gebken) re Voluntary Submission of Water and Dietary Exposure Assessments
An updated dietary exposure and risk assessment based on DEEM-FCID Version 3.18 and 20% of the citrus crop treated found that the most highly exposed sub-population was children age 1 to 2 years. This group was estimated to have a dietary exposure of 78.9 % of the aPAD at the 99.9th percentile of exposure. The next highest exposed population subgroup was children 3 to 5 years old that had estimated aldicarb exposures 58.8% of the PAD. Estimated exposures in all other population subgroups remained well below 50% of the aPAD.
2018-10-03a Submit Drinking Water Exposure Assessment Dated 9-26-18 MRID 50693401
2018-10-03b Submit Dietary Exposure and Risk Assessment Dated 9-28-18 MRID 50693402

2018-10-04 Letter to EPA (Richard Gebken) for Resubmission of Drinking Water and Dietary Reports to EPA
At the request of EPA (Richard Gebken), we resubmitted the two reports that were submitted on October 4, 2020 (note the new MRID numbers). An updated dietary exposure and risk assessment based on DEEM-FCID Version 3.18 and 20% of the citrus crop treated found that the most highly exposed sub-population was children age 1 to 2 years. This group was estimated to have a dietary exposure of 78.9 % of the aPAD at the 99.9th percentile of exposure. The next highest exposed population subgroup was children 3 to 5 years old that had estimated aldicarb exposures 58.8% of the PAD. Estimated exposures in all other population subgroups remained well below 50% of the aPAD.
2018-10-04a Drinking Water Exposure Assessment Dated 9-26-18 MRID 50695601
2018-10-04b Dietary Exposure and Risk Assessment Dated 9-28-18 MRID 50695602

2018-10-11 Conference call with EPA to Discuss EPA's Concerns About Use of Aldicarb on Citrus (Florida SLN)
In this conference call EPA said as there currently is no SLN pending. As Florida has not submitted an SLN for the use of aldicarb on Florida citrus EPA is not under any obligation to review our updated risk assessments or any other information AgLogic has provided or to tell Florida that its concerns are resolved.

2018-10-12 Pyxis Letter Outlining Citrus Section 3 Approach

2018-10-15 Follow up email to EPA (Richard Keigwin, Kevin Costello, Bo Davis) re Meetings and Correspondence re Aldicarb Florida SLN Citrus Issues
This email acknowledged Richard Keigwin's letter of August 15, 2018 regarding the proposed Florida SLN for use of aldicarb on citrus. Keigwin's letter requested additional information on three issues related to EPA's assessment and indicated that EPA would likely revise its assessment if Aglogic is able to resolve those issues. The email stated that AgLogic's letter of September 14, 2018 and attachments thereto provided the additional information EPA requested on all three issues. On October 4, 2018 AgLogic submitted an updated dietary exposure and risk assessment (MRID Nos. 50695602) affirming the safety of the proposed use of aldicarb on Florida citrus.

2018-10-17 Notes from EPA-Pyxis Conference Call re FL and TX Citrus SLN

2019-02-11 Lateral Velocity Report MRID 50780602

2019-02-12 Updated Dietary Exposure and Risk Assessment MRID 50780601

Submissions and Correspondence Related to the Section 3 Submission for Use of Aldicarb on Oranges and Grapefruit in Florida and Texas

2019-02-12 Section 3 Citrus Application for Aldicarb Tech 87895-2 was Submitted to EPA (Richard Gebken)
2019-02-12 Citrus Label Aldicarb Tech 87895-2

2019-02-12 Section 3 Citrus Application for Aldicarb 15GG 87895-4 was Submitted to EPA (Richard Gebken)
2019-02-12a Citrus Label AgLogic 15GG - 87895-4
2019-02-12b Updated Dietary Exposure and Risk Assessment Dated 2-12-19 MRID 50780601
An updated dietary exposure and risk assessment based on DEEM-FCID Version 3.18 and 21% of the citrus (orange, grapefruit, lemon, lime) crop treated found that the most highly exposed sub-population was children age 1 to 2 years. This group was estimated to have a dietary exposure of 78.7 % of the aPAD at the 99.9th percentile of exposure. The next highest exposed population subgroup was children 3 to 5 years old that had estimated aldicarb exposures 59.7% of the aPAD. Estimated exposures in all other population subgroups remained well below 50% of the aPAD.
2019-02-12c Ground Water Lateral Flow Velocity Report Dated 2-11-19 MRID 50780602
Our comprehensive report on ground water lateral flow velocity explains why it is appropriate to use a lateral flow velocity of 0.49 ft/day when conducting aldicarb exposure and risk assessments.

2019-02-13 Response from EPA (Susan Bartow) re Determination of Lateral Flow
Lateral groundwater flow velocities can vary by many orders of magnitude. According to USGS a *"velocity of 1 foot per day or greater is a high rate of movement for ground water, and ground-water velocities can be as low as 1 foot per year or 1 foot per decade."* Because USGS is a technical authority in groundwater research, many risk assessors in OPP have been using the 1 ft/day value from this website as a conservative estimate of lateral groundwater flow velocity.
2019-02-13a Additional Information re EPA's Determination of Lateral Flow
2019-02-13b USGS Circular 1186, Sustainability of Ground-Water Resources Dated 1999

2019-03-07 PRIA Dates for Citrus Applications

2019-03-07a 87895-2 PRIA TRACKING MILESTONE 1

2019-03-07b 87895-4 PRIA TRACKING MILESTONE 1

2019-03-25 EPA Asks for Full PRIA Fee for Each of Four Commodities

2019-03-26 Remove Lemons and Limes

2019-03-26 Revised PRIA Fee Based on Oranges and Grapefruit

2019-04-23 Update on PRIA Dates

2019-06-21 Chronology of SLN Application for Use of Aldicarb on Florida Citrus 6/21/19

2019-12-23 Waterborne Assessment of Soils, Crops and Shallow Groundwater in Aldicarb Use Areas in Florida
The use of 0.49 ft/d lateral velocity is representative of vulnerable aquifer conditions in Florida and when used in the risk assessment to calculate setback distances (1000 ft) from aldicarb application areas is protective of drinking water wells. This has been demonstrated by the results of the Florida Aldicarb Rule.

2020-01-23 Call with EPA (Marion Johnson, Debra Rate, Shanta Adeeb) on Aldicarb Citrus Application
2020-01-23a Notes from Call with EPA re Citrus Application
Based on preliminary runs for the dietary risk assessment, EPA is finding exceedances of dietary risk for food alone. EPA has determined the aPAD for children (1-2 years old) is about 117% and this does not include drinking water. They are using, based on input from BEAD, the proposed percent crop treated of 65% for oranges, 85% for orange juice, 90% for grapefruit and 90% for grapefruit juice. We asked if eliminating grapefruit would help and they reported that orange juice is the primary driver. They are aware that the proposed percent crop treated is significantly different than what AgLogic proposed but are basing their numbers on input from BEAD and not other information, such as data provided by AgLogic. We requested that EPA provide the DEEM results, but they said they needed to have internal discussions before deciding what, if anything, they would provide. EPA also did some preliminary water numbers as apparently there is a new model available for drinking water. This new model, assuming the aldicarb granules are buried 6 inches into the soil, is giving us 4X the old DWLOC level, so drinking water is also a concern.

2020-02-03 LRH Determination of Percent Crop Treated for Oranges and Grapefruit – DRAFT

2020-02-04 email from EPA with DEEM Input Files

2020-02-11 emailed to EPA (Marion Johnson, Debra Rate, Shanta Adeeb) Determination of Percent Orange and Grapefruit Acres Treated with AgLogic 15GG Aldicarb
In response to the January 23, 2020 phone discussion with EPA (Marion Johnson, Debra Rate, Shanta Adeeb), we submitted our report titled *Determination of Percent Orange and Grapefruit Acres Treated with AgLogic 15GG Aldicarb.* This report provides a detailed analysis of orange and grapefruit acres in the US and calculates the potential percent crop treated with aldicarb. In conclusion, the report states: *"After a review of recent acreage statistics for oranges and grapefruit, decades of historical use of aldicarb on citrus in Florida and Texas, the limited annual production capacity, and availability of AgLogic 15GG, the percent crop treated value should be revised from 65% on fresh oranges, 85% on juice oranges, and 90% on fresh and juice grapefruit, to 14.6% of the US orange and grapefruit acreage. This is a realistic, supportable, and conservative estimate for use in the aldicarb acute dietary exposure and risk assessment."*

2020-02-13 Proposed Call Date with EPA

2020-02-24 Information Requested by EPA - Stewardship and Calibration Program

2020-03-06 emailed to EPA (Marion Johnson, Debra Rate, Shanta Adeeb) Additional Information Related to Aldicarb Use on Oranges and Grapefruit in Florida and Texas
In response to the February 24, 2020 phone discussion with EPA, we submitted our report titled, *"Additional Information Related to Aldicarb Use on Oranges and Grapefruit in Florida and Texas."* This report provides additional supporting information related to the use of aldicarb on oranges and grapefruit in Florida and Texas supplementing the data provided on February 11, 2020. Included in this report are details on Production Limitations, AgLogic Stewardship, Florida Restrictions, Comparative Products, and Root Response to Aldicarb. Additionally, this reports states that AgLogic would commit to limiting use on oranges and grapefruit to no more than 2,500,000 pounds of aldicarb 15GG annually, which could treat 100,000 acres of bearing oranges and grapefruit if applied at 25 lbs aldicarb 15GG per acre, or 75,757 acres of bearing oranges and grapefruit if applied at 33 lbs. of aldicarb 15 GG per acre.

2020-07-09 EPA (Debra Rate, Shanta Adeeb) Request for 60-Day Extension of PRIA Dates

2020-07-10 AgLogic Response to EPA (Debra Rate, Shanta Adeeb) PRIA Date Extension Request

2020-07-10 EPA (Debra Rate, Shanta Adeeb) Acknowledge New PRIA Date

2020-07-28 Resubmit SLN Support Information to EPA (Debra Rate, Shanta Adeeb) that was Sent to Keigwin on 7-2-18
This letter, addressed to Richard Keigwin and Nancy Beck, stated that AgLogic conducted a dietary exposure and risk assessment to assist the Agency in its assessment of aldicarb, including use on citrus under a Florida SLN. Additionally, it noted that this risk assessment was submitted to EPA earlier this year on March 19, 2018 and that the risk assessment was conducted using models and methods identical to those used by EPA's risk assessors. The risk assessment demonstrated that 20% of the US citrus crop may be treated with aldicarb and dietary exposures (including food and water) for all sub-populations are well below any level of concern.
2020-07-28a Rathvon's Letter to Keigwin re FL Citrus Dated 7-2-18
2020-07-28b Attachment 1 Affidavits from Growers and Researchers Dated 7-2-18
2020-07-28c Attachment 2 Letters of Support from Growers and Researchers Dated 7-2-18

2020-09-08 EPA (Debra Rate, Marion Johnson, Shanta Adeeb) Request for 120-Day Extension of PRIA Dates

2020-09-10 AgLogic's Response to EPA's (Debra Rate, Shanta Adeeb) PRIA Date Extension Request

2020-09-11 Reply to EPA's (Debra Rate, Shanta Adeeb) Request for PRIA Extension
In response to the September 9, 2020 phone call with EPA (Debra Rate, Shanta Adeeb) we resubmitted information clearly explaining that aldicarb is not used on any crop in Mexico, depth of incorporation of aldicarb granules, why aldicarb will be used on no more than 20% of the national citrus crop, and that the resulting dietary exposure will be well below any EPA Level of Concern for the general US population and all sub-populations. We also noted that both citrus growers and researchers have repeatedly requested the reinstatement of aldicarb for use on citrus in Florida. Furthermore, we pointed out that AgLogic has provided the Agency with significant amounts of information on the above subjects since 2017 and that we are resubmitting some of those reports as attachments. We also requested additional details on the EPA's on-going risk assessments.
2020-09-11a Rathvon's Letter with Attachments that was Sent to Richard Keigwin Dated 9-14-18
This response to Richard Keigwin's letter, dated August 15, 2018, consists of a cover letter and four attachments addressing the three concerns identified in the letter. We clearly explained, and documented, that (1) the resulting dietary exposure will be well below any EPA Level of Concern for the general US population and all sub-populations and that the aRFD for the most sensitive population, children age 1-2, was calculated to be 78.9 based on DEEM-FCID Version 3.18; (2) we documented that aldicarb is not used on any crop in Mexico; and (3) we showed that aldicarb will be used on no more than 20% of the national citrus crop. Our comprehensive report on ground water lateral flow velocity explained why it is appropriate to use a lateral flow velocity of 0.49 ft/day when conducting aldicarb exposure and risk assessments.
2020-09-11b Determination of Percent Orange and Grapefruit Acres Treated with AgLogic 15GG Aldicarb - Dated 2-11-20
This report, submitted to EPA on February 11, 2020, provides a detailed analysis of orange and grapefruit acres in the US and calculates the potential percent crop treated with aldicarb. In conclusion, the report states: *"After a review of recent acreage statistics for oranges and grapefruit, decades of historical use of aldicarb on citrus in Florida and Texas, the limited annual production capacity, and availability of AgLogic 15GG, the percent crop treated value should be revised from 65% on fresh oranges, 85% on juice oranges, and 90% on fresh and juice grapefruit, to 14.6% of the US orange and grapefruit acreage. This is a realistic, supportable, and conservative estimate for use in the aldicarb acute dietary exposure and risk assessment."*
2020-09-11c Additional Information Related to Aldicarb Use on Oranges and Grapefruit in Florida and Texas - Dated 3-6-20
In response to the February 24, 2020 phone discussion with EPA, we submitted our report titled, *"Additional Information Related to Aldicarb Use on Oranges and Grapefruit in Florida and Texas."* This report provides additional supporting information related to the use of aldicarb on oranges and grapefruit in Florida and Texas supplementing the data provided on February 11, 2020. Included in this report are details on Production Limitations, AgLogic Stewardship, Florida Restrictions, Comparative Products, and Root Response to Aldicarb. Additionally, this reports states that AgLogic would commit to limiting use on oranges and grapefruit to no more than 2,500,000 pounds of aldicarb 15GG annually, which could treat 100,000 acres of bearing oranges and grapefruit if applied at 25 lbs aldicarb 15GG per acre, or 75,757 acres of bearing oranges and grapefruit if applied at 33 lbs. of aldicarb 15 GG per acre.

2020-09-16 email from EPA (Debra Rate, Marion Johnson, Shanta Adeeb) Providing BEAD's Percent Crop Treated Figures
This email provided the percent crop treated figures provided by BEAD: 18% oranges, 90% orange juice, 65% grapefruit, 90% grapefruit juice. These figures were used in EPA's DEEM analysis.

2020-09-22 Response to EPA (Debra Rate, Shanta Adeeb) re Percent Crop Treated Oranges and Grapefruit

Our response restated our position on percent crop treated based on the use of aldicarb on oranges and grapefruit in Florida and Texas only. We reviewed the US orange and grapefruit acres and our calculations of percent crop treated. Additionally, we restated our commitment of March 6, 2020 Additionally, to limit use on oranges and grapefruit to no more than 2,500,000 pounds of aldicarb 15GG annually, which could treat 100,000 acres of bearing oranges and grapefruit if applied at 25 lbs aldicarb 15GG per acre, or 75,757 acres of bearing oranges and grapefruit if applied at 33 lbs. of aldicarb 15 GG per acre. We also asked for BEAD to provide more details regarding their assumptions regarding treated acreage on imported crops. Additionally, we requested a meeting between AgLogic and BEAD to discuss the inputs we EPA/BEAD have reviewed our information/submittals.

2020-09-22a Affidavit on Aldicarb of Dr. Philip A. Stansly Dated 5-21-18

Dr. Stansly stated, "It may not be hyperbole to state that re-registration of aldicarb could make the difference between life and death of Florida's iconic citrus industry. Accordingly, I urged that no effort be spared in registering aldicarb again for citrus in Florida."

2020-10-05 EPA (Debra Rate) Response to Our email of 9/22/20 re Percent Crop Treated

EPA's most recent dietary risk assessment was based on the following percent crop treated figures:

Orange (fresh): 15% domestic; 3% import (18%)
Orange (juice): 75% domestic; 15% import (90%)
Grapefruit (fresh)
Grapefruit (juice)

	% CT	RA	Import
SLN	9	5	7
Section 3	6	2	3
TOTAL	15	7	10